

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CBC RESTAURANT CORP., et al.,¹

Debtors.

Chapter 11

Case No. 23-10245 (KBO)

(Jointly Administered)

**VERIFIED STATEMENT OF THE AD HOC CBC FRANCHISEE COMMITTEE
PURSUANT TO BANKRUPTCY RULE 2019**

In connection with the jointly administered Chapter 11 cases (the “Bankruptcy Case”) of the above-captioned debtors and debtors-in-possession (the “Debtors”), Benesch, Friedlander, Coplan & Aronoff LLP and Ross, Smith & Binford, PC (collectively, “Counsel”), hereby submit this verified statement (the “Verified Statement”) pursuant to Federal Bankruptcy Rule of Procedure 2019 in connection with Counsels’ representation of the Ad Hoc CBC Franchisee Committee.

1. On November 15, 2022, certain members of the Ad Hoc CBC Franchisee Committee retained Ross, Smith & Binford, PC (then known as Ross & Smith, PC) in connection with general legal advice including a possible bankruptcy filing of the Debtors.

2. On March 2, 2023, members of the Ad Hoc CBC Franchisee Committee retained Counsel in connection with the Bankruptcy Case. Each member of the Ad Hoc CBC Franchisee Committee has consented to Counsels’ representation.

3. The Ad Hoc CBC Franchisee Committee has been formed to represent the interests

¹ The Debtors are the following entities (the last four digits of their respective taxpayer identification numbers (if required) follow in parentheses): CBC Restaurant Corp. (0801), Corner Bakery Holding Company (3981), and CBC Cardco, Inc. (1938). The Debtors’ service address is 121 Friends Lane, Suite 301, Newtown PA 18940.

of the franchisee committee members in this Bankruptcy Case. The members of the Ad Hoc CBC Franchisee Committee, including their addresses and the store numbers associated with each franchisee member, are listed on the attached **Exhibit A**. As of the filing of this Verified Statement, none of the Ad Hoc CBC Franchisee Committee members are owed money by the Debtors. However, each Ad Hoc CBC Franchisee Committee member is a party to a franchise agreement with debtor CBC Restaurant Corp. and therefore each Ad Hoc Committee member is a party-in-interest in the Bankruptcy Case with the potential for asserting claims based on whether the Debtors chose to assume or reject the respective franchise agreements. The Ad Hoc CBC Franchisee Committee members each reserve their rights with respect to asserting claims in the Bankruptcy Case.

4. As of the date of this Verified Statement, Counsel represents the members of the Ad Hoc CBC Franchisee Committee only in their capacities as such and do not currently represent or purport to represent any other persons or entities in connection with this Chapter 11 Case.

5. As of the date of this Verified Statement, the Ad Hoc CBC Franchisee Committee, both collectively and through its individual members, does not represent or purport to represent any persons or entities in connection with the Chapter 11 Case.

6. The information contained in this Verified Statement and Exhibit A is provided solely with respect to Bankruptcy Rule 2019 and is not intended for any other purpose. Nothing contained herein should be construed as a limitation or waiver of any rights of any member of the Ad Hoc CBC Franchisee Committee including, without limitation, the right to assert, file, and/or amend any claims in accordance with applicable orders entered in this Bankruptcy Case.

7. The Ad Hoc CBC Franchisee Committee, through Counsel, reserves the right to amend and/or supplement this Verified Statement in accordance with the requirements set forth in Bankruptcy Rule 2019 at any time.

Date: March 7, 2023
Wilmington, Delaware

**BENESCH, FRIEDLANDER, COPLAN
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